

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP,)
BI-LEVEL PAP, AND MECHANICAL) Master Docket: Misc. No. 21-1230
VENTILATOR PRODUCTS)
LITIGATION,) MDL No. 3014
This Document Relates to: All Actions)

Joint Proposed Agenda for April 20, 2023 Status Conference: Philips MDL 3014

1. Discovery Update/Status of Proceedings with Special Master Katz;
2. May 25, 2023 Argument on (1) Koninklijke Philips N.V.'s 12(b)(2) Motion; and (2) Koninklijke Philips N.V., Philips North America LLC, Philips Holding USA, Inc. and Philips RS North America Holding Corp.'s related 12(b)(6) Motions;
3. Status of Briefing Remaining Rule 12 Motions Before Special Master Vanaskie;
4. Remaining Disputes on Case Management Schedule;
5. Forthcoming Motion to Modify Pretrial Order No. 22 to Extend the Deadline for Motions to Remand;
6. Update on Census Registry; Update on State Court Litigation; and
7. LDC Update.

Dated: April 18, 2023

/s/ John P. Lavelle, Jr.
John P. Lavelle, Jr., Esquire
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
T 215.963.5000
john.lavelle@morganlewis.com

/s/ Wendy West Feinstein
Wendy West Feinstein, Esquire
MORGAN, LEWIS & BOCKIUS LLP
One Oxford Center, 32nd Floor
Pittsburgh, PA 15219-6401
T 412.560.3300

Respectfully submitted,

/s/ Kelly K. Iverson
Kelly K. Iverson, Esquire
LYNCH CARPENTER, LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
T (412) 322-9243
kelly@lcllp.com

/s/ Christopher A. Seeger
Christopher A. Seeger, Esquire
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
212-584-0700

wendy.feinstein@morganlewis.com

cseeger@seegerweiss.com

Counsel for Defendant Philips RS North America, LLC

/s/ Michael H. Steinberg

Michael H. Steinberg, Esquire
SULLIVAN & CROMWELL LLP
1888 Century Park East
Los Angeles, CA 90067
T (310) 712-6670
steinbergm@sullcrom.com

/s/ Tracy Richelle High

Tracy Richelle High, Esquire
William B. Monahan, Esquire
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004
T: (212) 558-4000
hight@sullcrom.com
monahanw@sullcrom.com

Counsel for Defendants Koninklijke Philips NV, Philips North America LLC, Philips Holding USA Inc., and Philips RS North America Holding Corporation

/s/ Eric Scott Thompson

Eric Scott Thompson, Esquire
FRANKLIN & PROKOPIK
500 Creek View Road
Suite 502
Ste 1210
Newark, DE 19711
T (302) 594-9780
ethompson@fandpnet.com

Counsel for Polymer Technologies, Inc. and Polymer Molded Products, LLC

/s/ Sandra L. Duggan

Sandra L. Duggan, Esquire
LEVIN SEDRAN & BERMAN
510 Walnut Street
Ste 500
Philadelphia, PA 19106
215-592-1500
215-592-4663 (fax)
sduggan@lfsblaw.com

/s/ Steven A. Schwartz

Steven A. Schwartz, Esquire
CHIMICLES SCHWARTZ
KRINER & DONALDSON-SMITH
LLP
361 West Lancaster Avenue
One Haverford Centre
Haverford, PA 19041
(610) 642-8500
steveschwartz@chimicles.com

Plaintiffs' Co-Lead Counsel

/s/ D. Aaron Rihn

D. Aaron Rihn, Esquire
ROBERT PEIRCE & ASSOCIATES, P.C.
707 Grant Street
Suite 125
Pittsburgh, PA 15219
412-281-7229
412-281-4229 (fax)
arihn@peircelaw.com

Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's CM/ECF system on this 18th day of April 2023 and is available for download by all counsel of record.

/s/ D. Aaron Rihn _____

D. Aaron Rihn, Esquire
PA I.D. No.: 85752
ROBERT PEIRCE & ASSOCIATES, P.C.
707 Grant Street
Suite 125
Pittsburgh, PA 15219
Tel: 412-281-7229
Fax: 412-281-4229
arihn@peircelaw.com